DATE: 03/11/10

FEE

SUBJECT: FEE PRODUCT CHEMISTRY REVIEW OF MP [] EP [X]
DP BARCODE No.: D373617
REG. No. /File Symbol No. 84542-U
PRODUCT: CUPRON ANTI-DUSTMITE FIBERS AND FABRICS
PCC: 042401   Decision No. 413984
FOOD USE [ ]
COMPANY: CUPRON INC.

FROM: Indira Gairola
               Product Chemistry Team
               Technical Review Branch/RD (7505P)

TO: Kimberly Nesci/ Olga Odiott PM 13
           Insecticide Branch /RD (7504P)

INTRODUCTION:

CUPRON INC. is submitting application for registration for the subject product CUPRON
ANTI-DUSTMITE FIBERS AND FABRICS. Applicant has submitted revised Basic
CSF dated 01/12/10 as per agency request. For details Please refer to the review by Indira
Gairola under bar code D349801.
Details are listed below:

1. The subject product CUPRON ANTI-DUSTMITE FIBERS AND FABRICS
   contains 2.1% of cupric oxide according to the revised CSF and Label.

2. Applicant had submitted MRID #s 477961-01, 473393-01, for 4.1% of Cupric
   oxide product chemistry data to support the registration.

3. These data do not match the current application for registration for 2.1% of
   cupric oxide according to the revised CSF and Label.

4. Applicant is required to submit Product specific product chemistry data consistent with
   the label claim revised Basic CSF dated 01/12/10.

5. Revised Basic CSF dated 01/12/10 and label cannot be accepted as submitted.

6. Data corresponding Sub Group A do not satisfy the data requirements of
   40CFR§158.320 to §158.355.

7. Product Chemistry Data for the Sub Group B for the proposed New Product have not been satisfied including 830.6317 & 830.6320 Corrosion Characteristic and Storage Stability data.

CONCLUSIONS:

TRB has reviewed the product chemistry data for the subject product CUPRON ANTI-DUSTMITE FIBERS AND FABRICS and has concluded that:

1. The subject product CUPRON ANTI-DUSTMITE FIBERS AND FABRICS contains 2.1% of cupric oxide.

2. The revised CSF dated 01/12/10 and Label both are unacceptable.

3. Product Chemistry data for Sub GroupA and Sub-group B have not been satisfied. See findings #s4, 5, 6 and 7.